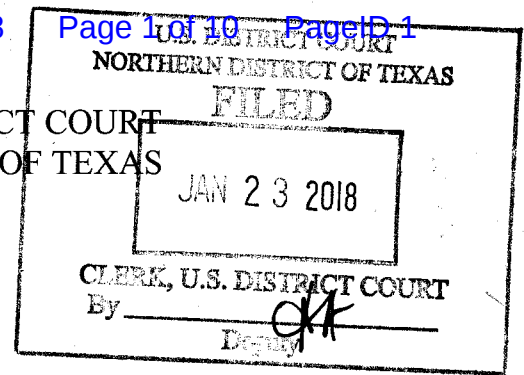


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

JARVIS BROUSSARD (01)

also known as "Koppo"

TREY NATHANIEL DICKERSON (02)

CHRISTIAN DEMOND GILBERT (03)

also known as "Go Getta"

RANDY LAMARK HAMMOND (04)

JOHN CHRISTOPHER JONES (05)

also known as "2tall"

BRANDON CHERMAINE MALLET (06)

also known as "Wookie"

CHRISHEENA LADALE MILBURN (07)

also known as "Beanz"

FERNANDO RAFAEL TAYLOR (08)

JONATHAN WALKER (09)

also known as "Johnathan Walker"

NO. **3-18CR-043-K**

FILED UNDER SEAL

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Interfere with Commerce by Robbery
(Violation of 18 U.S.C. § 1951(a))

On or about February 4, 2016, and continuing until at least on or about July 22, 2017, in the Dallas Division of the Northern District of Texas and elsewhere, **Jarvis Broussard** (hereinafter "**Broussard**"), **Trey Nathaniel Dickerson**, (hereinafter "**Dickerson**"), **Christian Demond Gilbert** (hereinafter "**Gilbert**"), **Randy Lamark Hammond** (hereinafter "**Hammond**"), **John Christopher Jones** (hereinafter "**Jones**"), **Brandon Chermaine Mallet** (hereinafter "**Mallet**"), **Chrisheena Ladale Milburn** (hereinafter "**Milburn**"), **Fernando Rafael Taylor** (hereinafter "**Taylor**"), and

Jonathan Walker (hereinafter “**Walker**”), the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit a certain offense against the United States, to wit: interference with commerce by robbery, in violation of 18 U.S.C. § 1951(a).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of United States currency, from the persons and in the presence of employees, owners, and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

MANNER AND MEANS

1. It was part of the conspiracy that **Broussard, Dickerson, Gilbert, Hammond, Jones, Mallet, Milburn, Taylor, and Walker**, the defendants, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, one or more of the following robberies:

| Date (on or about) | Business | Offense Location |
|--------------------|--|---|
| June 21, 2016 | Gene's Liquor and Gene's Check Cashing | 2445 West Northwest Highway, Dallas, Texas |
| January 28, 2017 | One Stop Food Store | Bordeaux Square, Irving, Texas |
| March 25, 2017 | J&B Check Cashing | 2418 S. Jupiter Road, Garland, Texas |
| April 22, 2017 | La Casita Grocery & Deli | 2111 Northwest Highway, Dallas, Texas |
| May 6, 2017 | Kingsley Grocery | 1433 W. Kingsley, Garland, Texas |
| May 27, 2017 | Forest Ln 786 LLC | 9798 Forest Lane, Dallas, Texas |
| June 29, 2017 | Zaitoon Operation | 11950 Webb Chapel Road, Dallas, Texas |
| July 14, 2017 | Citywide ATM | 2702 Elsie Faye Heggins Street, Dallas, Texas |

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as contemplated by 18 U.S.C. § 1951.

2. It was further part of the conspiracy that the defendants and others known and unknown to the Grand Jury formulated a plan and agreement, which, among other things, included:

- a. the acquisition of United States currency;
- b. the surveillance and selection of individuals for robbery;
- c. the acquisition of property for use in committing robbery;
- d. the timing and means of transportation to commit robbery;
- e. the roles of participants during the preparation for and commission of robbery;
- f. the division of proceeds obtained from robbery; and
- g. plans to avoid detection and apprehension by law enforcement.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

To effect the object of the conspiracy, **Broussard, Dickerson, Gilbert, Hammond, Jones, Mallet, Milburn, Taylor, and Walker**, the defendants, and other persons known and unknown to the Grand Jury, committed overt acts within the Northern District of Texas, and elsewhere, including, but not limited to, the following:

1. On or about June 21, 2016, **Mallet, Milburn, Taylor**, and a person known to the Grand Jury, aided and abetted by each other, took personal property, consisting of a bag containing United States currency, from the person and in the presence of D.K., an

employee and agent of Gene's Liquor and Gene's Check Cashing, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

2. On or about January 28, 2017, **Gilbert, Jones, Mallet, Milburn, and Walker**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from the person and in the presence of B.P., an owner and agent of One Stop Food Store, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

3. On or about March 25, 2017, **Hammond, Jones, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from the person and in the presence of A.R.J., owner and agent of J&B Check Cashing, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

4. On or about April 22, 2017, **Broussard, Jones, Mallet, and Milburn**, aiding and abetting one another, attempted to take personal property, consisting of a bag containing United States currency, from the person and in the presence of J.A., an owner and agent of La Casita Grocery & Deli, against her will, by means of actual or threatened force, violence, and fear of injury to her person.

5. On or about May 6, 2017, **Hammond, Jones, Mallet, and Milburn**, aiding and abetting one another, took and attempted to take personal property, consisting of two bags containing United States currency, from the person and in the presence of A.A.J., owner and agent of Kingsley Grocery, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

6. On or about May 27, 2017, **Hammond, Jones, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a box containing United States currency, from the person and in the presence of M.A., owner and agent of Forest Ln 786 LLC, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

7. On or about June 29, 2017, **Dickerson, Hammond, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from and in the presence of N.A., a manager, employee, and agent of Zaitoon Operation, against his will, by means of actual or threatened force, violence, and fear of injury to his person, his property, and property in his custody and possession.

8. On or about July 14, 2017, **Dickerson, Gilbert, Mallet, and Milburn**, aiding and abetting one another, took personal property, consisting of a bag containing United States currency, from the person and in the presence of A.R., an employee and agent of Citywide ATM, against his will, by means of actual or threatened force, violence, and fear of injury to his person.

9. On or about July 22, 2017, **Dickerson, Gilbert, Jones, Mallet, and Milburn**, aiding and abetting one another, took a bag from inside a vehicle in the custody and possession of an undercover police officer.

In violation of 18 U.S.C. § 1951(a).

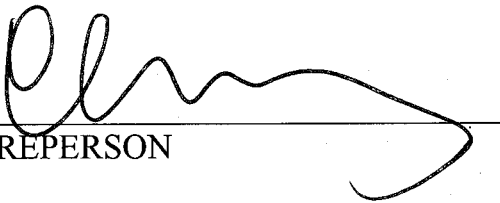
Counts Two through Nine
Interference with Commerce by Robbery
(Violation of 18 U.S.C. §§ 1951(a) and 2)

On or about the dates listed below, in the Dallas Division of the Northern District of Texas, the defendants listed below, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants listed below, aiding and abetting one another, did unlawfully take, obtain, and attempt to take and obtain personal property, consisting of United States currency, from a person and in the presence of a person, in that person's capacity as owner, employee, officer, and agent of the businesses listed below and against that person's will by means of actual and threatened force, violence, and fear of immediate injury to the individual's person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

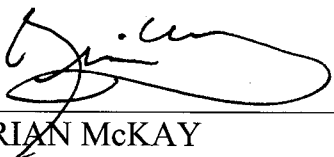
| Count | Date (on or about) | Defendants | Business Victim |
|-------|--------------------|--|---|
| 2 | June 21, 2016 | Mallet Milburn, Taylor | Gene's Liquor and Gene's Check Cashing |
| 3 | January 28, 2017 | Gilbert Jones Mallet Milburn Walker | One Stop Food Store |
| 4 | March 25, 2017 | Hammond Jones Mallet Milburn | J&B Convenience Store |
| 5 | April 22, 2017 | Broussard Jones Mallet Milburn | La Casita Grocery |
| 6 | May 6, 2017 | Hammond Jones Mallet Milburn | Kingsley Grocery |
| 7 | May 27, 2017 | Hammond Jones Mallet Milburn | E-Z Trip #9 |
| 8 | June 29, 2017 | Dickerson Hammond Mallet Milburn | Zaitoon Operation |
| 9 | July 14, 2017 | Dickerson Gilbert Mallet Milburn | Citywide ATM |

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



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INDICTMENT

18 U.S.C. § 1951(a)
Conspiracy to Interfere with Commerce by Robbery

18 U.S.C. §§ 1951(a) and (2)
Interference with Commerce by Robbery

9 Counts

A true bill rendered

DALLAS

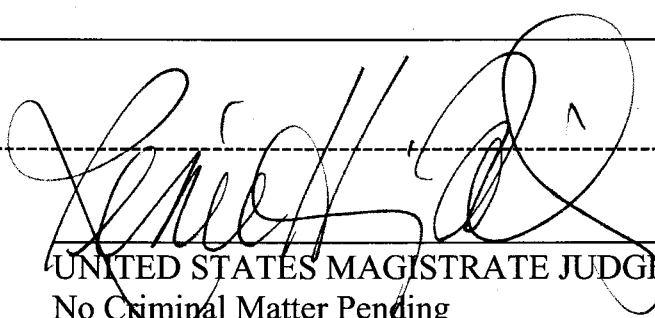
FOREPERSON



Filed in open court this 23rd day of January, 2018.

Clerk

Warrant to be Issued


UNITED STATES MAGISTRATE JUDGE
No Criminal Matter Pending